

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

HASBRO, INC.,

Plaintiff,

-against-

INFOGRAMES ENTERTAINMENT, S.A.  
a/k/a ATARI, S.A.,

Defendant.

C.A. No. 09 Civ. 610 (S) (LDA)

**HASBRO, INC.'S MOTION TO AMEND THE STIPULATION AND PROTECTIVE  
ORDER CONCERNING CONFIDENTIALITY OF DISCOVERY MATERIALS**

Plaintiff Hasbro, Inc. (“Hasbro”) hereby moves pursuant to Rule 26 of the Federal Rules of Civil Procedure for an order amending the May 27, 2010 Stipulation and Protective Order Concerning Confidentiality of Discovery Materials (“Protective Order”). *See, e.g.*, Docket Nos. 34-35. Specifically, Hasbro seeks to modify the parties’ stipulated Protective Order to add an additional layer of protection—an “Attorneys’ Eyes Only” provision—to prevent undue dissemination of confidential and/or proprietary documents and information concerning games or products which are unrelated to this action. Although Hasbro has attempted to meet and confer in good faith with defendant Atari, S.A. (“Atari”) concerning this matter, the parties have reached an impasse, thereby forcing Hasbro to seek the Court’s intervention. *See* Declaration of James M. Pearl (“Pearl Declaration”) at ¶¶ 3-6 (filed concurrently herewith). In support of its Motion, Hasbro relies upon the contemporaneously-filed Memorandum of Points and Authorities and the supporting Pearl Declaration.

Dated: January 14, 2011

HASBRO, INC.  
By its Attorneys,

/s/ Todd D. White

Todd D. White

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of January 2011 an electronic copy of the within document was served upon the following counsel of record via the PACER/ECF system:

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